

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 21-10457 (LSS)
Jointly Administered

Related to D.I. 505

**CERTIFICATION OF COUNSEL REGARDING FINAL DECREE CLOSING CASE OF
MOBITV SERVICE CORPORATION**

I, Howard A. Cohen, a partner with Fox Rothschild LLP, counsel to E. Lynn Schoenmann, the Liquidating Trustee (the “Trustee”) for the Liquidating Trust² of MobiTV, Inc. (“MobiTV”) and MobiTV Service Corporation (“MobiTV Services”, and together with MobiTV, the “Debtors”) in the above-captioned cases, hereby certify as follows:

1. On March 1, 2021 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
2. On July 20, 2021, the Debtors and the Official Committee of Unsecured Creditors filed jointly the *First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (the “Plan”) [D.I. 401].
3. On September 23, 2021, the Court entered an order confirming the *First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (the “Confirmation Order”) [D.I. 505], and the effective date (“Effective Date”) occurred on the same day. See Notice of Effective Date [D.I. 507]. Pursuant to the Plan and Confirmation Order, E. Lynn Schoenmann

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: MobiTV, Inc. (2422) and MobiTV Service Corporation (8357). The Debtors’ mailing address is 1900 Powell Street, 9th Floor, Emeryville, CA 94608.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Plan (as defined herein).

was approved as Trustee of the Liquidating Trust, and her appointment was effective as of the Effective Date.

4. Pursuant to Article 7.12 of the Plan, the Trustee is authorized, as of the Effective Date, to submit a proposed final decree to the Court under Certification of Counsel closing the case of MobiTV Service Corporation. Accordingly, the Trustee hereby submits, in the form attached hereto as **Exhibit A** (the “Proposed Order”), a proposed final decree order closing the Chapter 11 case of MobiTV Service Corporation. The Proposed Order has been circulated to the U.S. Trustee, who has no objection to its entry.

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A**, and granting such other and further relief as this Court may deem just and proper.

Dated: January 26, 2022

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/s/ Howard A. Cohen

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*Counsel for E. Lynn Schoenmann,
Liquidation Trustee*

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: MOBITV, INC., Debtor.	Chapter 11 Case No. 21-10457 (LSS) Jointly Administered Related to D.I. _____
In re: MOBITV SERVICE CORPORATION, Debtor.	Chapter 11 Case No. 21-10458 (LSS) Jointly Administered Related to D.I. _____

FINAL DECREE CLOSING THE CASE OF MOBITV SERVICE CORPORATION

This matter coming before the Court upon *Certification of Counsel Regarding Final Decree Closing Case of MobiTV Service Corporation* (the “Certification of Counsel”); and the Court having jurisdiction over the matters raised in the Certification of Counsel pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the relief requested is in accordance with the terms of the *First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (the “Plan”) [D.I. 401]; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Chapter 11 Case of MobiTV Service Corporation (Case No. 21-10458) is hereby closed (the “Closing Case”).
2. The Chapter 11 Case of MobiTV, Inc. (Case No. 21-10457) (the “Remaining Case”) shall remain open pending further order of this Court.
3. This Order shall be entered on the docket of the Closing Case.

4. Entry of this Order shall have no effect whatsoever on any contested or other matters pending before this Court. Further, entry of this Order shall not limit the Liquidating Trust's right to take any action or assert any claim, objection, cause of action or otherwise bring any other matter relating to MobiTV Service Corporation in the Remaining Case as if such case was not closed.

5. Entry of this Order is without prejudice to the rights of the Liquidating Trust, any Debtor or other party in interest to seek to reopen the Closing Case for cause pursuant to section 350(b) of the Bankruptcy Code.

6. MobiTV Service Corporation shall remain responsible for making payments of U.S. Trustee quarterly fees and filing any required reports in accordance with the terms of the Plan and Confirmation Order, up to and including the date of entry of this Order.